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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DAHLIA DWEDAR,

Plaintiff,

v.

STATE OF NEVADA EX REL. BOARD OF
REGENTS OF THE NEVADA SYSTEM OF
HIGHER EDUCATION, ON BEHALF OF
THE UNIVERSITY OF NEVADA RENO,

Defendant.

Case No. 3:24-CV-00583-MMD-CLB

**STIPULATION AND [PROPOSED
ORDER] REGARDING EXCHANGE OF
INITIAL DISCLOSURES
(First Request)**

Pursuant to Federal Rule of Civil Procedure 26(a)(1)(C), LR IA 6-2, LR 7-1 and LR 26-3, Plaintiff Dahlia Dwedar (“Plaintiff”) appearing through counsel of record Trevor J. Hatfield, Esq., Defendant Board of Regents of the Nevada System of Higher Education on behalf of the University of Nevada, Reno (“UNR”) appearing through counsel of record Claudia E. Aguayo, Esq., Frank Z. LaForge, Esq. and Scott H. Husbands, Esq., ”) hereby stipulate and agree that the parties will exchange their FRCP 26(a)(3) initial disclosures on or before May 12, 2025. The parties briefly met and conferred for their FRCP Rule 26(f) conference on April 4, 2025. Per FRCP 26(a)(1)(C), the parties’ initial disclosures were to be

1 exchanged by April 18, 2025 which is the date that is 14 days after the parties' Rule 26(f)
 2 conference. The parties met and conferred during the week of April 14 about the need for a
 3 follow up Rule 26(f) conference. The parties agreed to conduct a follow up Rule 26(f)
 4 conference during the week of April 21 to discuss case-related issues in further detail. During
 5 their meet and confer, the parties also discussed a mutually agreeable date for exchange of
 6 their initial disclosures. Both parties' counsel have been occupied on other matters and both
 7 parties require additional time to collect, review, and produce their initial disclosures. The
 8 parties selected May 12, 2025 as that would allow time for the parties to review the
 9 disclosures in preparing the early neutral evaluation statements that are due on May 27, 2025.
 10

11 The parties respectfully request the Court order that the parties exchange their FRCP
 12 26(a)(1) disclosures on or before May 12, 2025. This request is not for the purpose of delay.
 13 This is the parties' first request to extend the date that their initial disclosures are due.
 14

15 STIPULATED and DATED this 22nd day of April, 2025.

16 /s/ Trevor J. Hatfield

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16 /s/ Scott H. Husbands

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21 **Attorneys for Defendant**

25 **IT IS SO ORDERED.**

25 DATED: _____

27 _____
 28 UNITED STATES MAGISTRATE JUDGE